

*outstanding* 8. (amended) An interactive communication system comprising means for communicating command information across a network between a server and a client, wherein the means for communicating command information comprises:

means for generating a command message including a command, a command descriptor, and one of a server route and a command node; and

means for transmitting the command message across a network upon occurrence of a triggering event.

REMARKS

Applicants are amending claims 1 and 8 in order to more clearly indicate that claims 1-7 are directed towards a method of communicating command information between a computer server and a client, and claims 8-14 are directed towards a system used to communicate command information between a computer server and a client. Applicants are enclosing a marked-up copy of amendments to the claims with this responsive amendment. No new matter is added by the foregoing amendments and these amendments are fully supported by the specification. See, e.g., Appl'n, Page 8, Lines 9-10. Applicants respectfully request that the Examiner reconsider the above-captioned patent application in view of the foregoing amendments and the following remarks.

1. Rejections

Claims 1-14 stand rejected under 35 U.S.C. §103(a), as allegedly rendered obvious by Woods et al. *Wired for speed: Efficient Routes on VRML 2.0* (Woods). Applicants respectfully disagree. Reconsideration and withdrawal of the rejection of claims 1-14 is respectfully requested.

2. 35 U.S.C. § 103(a)

a. Woods

The Office Action alleges that Woods discloses or suggests most of the limitations of claims 1 and 8 except for the "client" and "server" interaction. Nevertheless, the Office Action alleges that this would be obvious to one of ordinary skill in the art. Applicants respectfully disagree.

Applicants' claim 1 describes a method of communicating messages between a server and a client across a network, and claim 8 describes a system used to communicate messages between a server and a client across a network. In contrast, Woods describes a method of affecting the current scene locally. Woods describes an implementation of the VRML specification. The VRML specification does not have a notion of a server. The event in Woods only affects the current scene after it is loaded. As clearly stated in Applicants specification, "an important distinction between VRML and MPEG-4 is that in the latter, scene descriptions can be updated dynamically using time-stamped commands. In contrast, VRML operates on static 'worlds.' After a world is loaded, there is no mechanism to modify it." See, e.g., Appl'n, Page 6, Lines 30-33. A VRML scene runs in a single process on a single machine.

There is no mention or suggestion in Woods or in the VRML specification to send a command message to the server. The messages sent in Woods are sent in order to affect the scene itself. It would not be obvious in light of Woods to send command messages to the server, and, in fact, Woods teaches away from this. As stated in Woods, "The goal of this design was to provide an efficient implementation of *node-to-node* communication *as required for animation of VRML 2.0 scenes.*" Woods, §7 (emphasis added). This is exactly what Woods comprehends. After a scene is loaded into a computer, various events can generate messages to animate the scene. For instance, a mouse click may generate a message for part of the scene to move across a computer monitor. Animation such as this requires time-sensitive interaction, such as is available through local node-to-node communication. The action caused by the event should appear to the user to be instantaneous.

There is no motivation to require communication between a client and a server for animation. In fact, in §7, Woods discusses at length the efficiency of the node-to-node communication. The design is said to be "successful" if the time for routing messages is insignificant. Woods continues to note that their optimization strategy is justified, because "users are unlikely to notice any significant message-routing overhead associated with scenes containing hundreds or thousands of routes." Woods §7.

In this way, Woods actually teaches away from sending command messages between a client and a server over a network, because the introduction of network delays would reduce the efficiency. The method taught in Woods was to provide efficient communication for

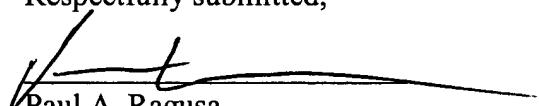
animation, which would lead one of ordinary skill in the art away from introducing communication over a network. Since Woods teaches away from sending command messages between a client and a server over a network, claims 1 and 8 are not obvious in light of Woods. Therefore, Applicants respectfully request that the Examiner withdraw the rejection of claims 1 and 8.

Additionally, claims 2-7 and 9-14 depend on claims 1 and 8 respectively. For the same reasons, Applicants respectfully request that the rejections for these claims be withdrawn also.

CONCLUSION

Applicants respectfully submit that this application is in condition for allowance, and such disposition is earnestly solicited.

Respectfully submitted,

  
Paul A. Ragusa  
Patent Office Reg. No. 38,587

Attorney for Applicants

BAKER BOTTS L.L.P.  
30 Rockefeller Plaza  
New York, NY 10112  
(212) 408-2588



PATENT  
AP31569-070050.0957

MARKED-UP COPY OF AMENDMENTS TO THE CLAIMS

1. (amended) A method for communicating command information between a server and a client across a network in an interactive communication system, comprising:

generating a command message including a command, a command descriptor, and one of a server route and a command node; and

transmitting the command message across a network upon occurrence of a triggering event.

8. (amended) An interactive communication system comprising means for communicating command information across a network between a server and a client, wherein the means for communicating command information comprises:

means for generating a command message including a command, a command descriptor, and one of a server route and a command node; and

means for transmitting the command message across a network upon occurrence of a triggering event.